

**OUTTEN & GOLDEN LLP**

Adam T. Klein  
Ossai Miazad  
Lewis Steel  
Christopher M. McNerney  
685 Third Avenue, 25th Floor  
New York, New York 10017

**NAACP LEGAL DEFENSE AND  
EDUCATIONAL FUND, INC.**

Sherrilyn Ifill  
Samuel Spital  
40 Rector Street, 5th Floor  
New York, New York 10006

Coty Montag  
700 14th Street NW, Suite 600  
Washington, D.C. 20005

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**CARNELLA TIMES and ERVING SMITH, on  
behalf of themselves and all others similarly  
situated, and THE FORTUNE SOCIETY, INC.,**

**Plaintiffs,**

**v.**

**TARGET CORPORATION,**

**Defendant.**

**No. 18 Civ. 2993**

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR  
CERTIFICATION OF THE SETTLEMENT CLASS AND  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Certification of the Settlement Class and Final Approval of Class Action Settlement and in the Declarations of Ossai Miazad, Coty Montag, and Lisa Levy in Support of Plaintiffs' Unopposed Motions for Certification of the Settlement Class and Final Approval of Class Action Settlement, Approval of Attorneys' Fees Costs, and Approval of Service Awards, and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) Granting the Motion for Certification of the Settlement Class and Final Approval of Class Action Settlement, and incorporating by reference all the terms, conditions, and obligations set forth in the Settlement Agreement;

- (2) Ordering the Settlement Administrator to distribute the settlement funds in accordance with the terms of the Settlement Agreement;
- (3) Retaining jurisdiction of this action in order to enter such further orders as may be necessary or appropriate in administering and implementing the terms and provisions of the Settlement Agreement; and
- (4) Granting any other relief that the Court deems just and proper.

\* \* \*

Plaintiffs have submitted a Proposed Order, attached as **Exhibit H** to the Miazad Declaration, for the Court's convenience.

Dated: October 9, 2019  
New York, New York

Respectfully submitted,

By: /s/ Ossai Miazad  
**OUTTEN & GOLDEN LLP**  
Ossai Miazad  
Adam T. Klein  
Lewis Steel  
Christopher M. McNerney  
685 Third Avenue, 25th Floor  
New York, New York 10017  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2060

**NCAAP LEGAL AND EDUCATIONAL  
DEFENSE FUND, INC.**

Sherrilyn Ifill  
Samuel Spital  
40 Rector Street, 5th Floor  
New York, NY 10006  
Telephone: (212) 965-2200

Coty Montag  
700 14th Street NW, Suite 600  
Washington, DC 20005

*Attorneys for Plaintiffs and the Settlement Class*

**CERTIFICATION OF SERVICE**

I hereby certify that on **October 9, 2019**, a copy of the foregoing document was filed electronically and service made by certified mail to anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by certified mail for anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ Ossai Miazad  
Ossai Miazad